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Attorney for Plaintiff Deborah Carroll

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

DEBORAH CARROLL,	)	Case No. 2:18-cv-00960-JCM-BNW
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>EXTEND TIME FOR PLAINTIFF</b>
v.	)	<b>TO RESPOND TO</b>
	)	<b>DEFENDANTS' MOTION FOR</b>
LADAH LAW FIRM PLLC; and RAMZY	)	<b>SUMMARY JUDGMENT</b>
LADAH;	)	<b>(FIRST REQUEST)</b>
	)	
Defendants.	)	

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No. 22) from the current due date of Monday, October 7, 2019 through and including **Monday, October 28, 2019.**

This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

1. Plaintiff's counsel was on vacation at the time that the Motion for Summary Judgment was filed on September 16, 2019 and his first day back in the office after vacation was September 26, 2019 and, thus, he has not had the benefit of the full response period to address the Motion for summary judgment;

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2. Additionally, Plaintiff's counsel is facing a very heavy workload with two other Summary Judgment Oppositions (in addition to the one in this case) due between now and November 1, 2019, an Opening Brief due in Judicial Review of a workers' compensation decision in state district court due on October 26, 2019, a Reply Brief due in another Judicial Review case due on October 18, 2019, and a Reply Brief due on a Ninth Circuit appeal that has been extended to November 4, 2019. These are all significant matters most of which requiring appellate level briefing;

3. Additionally, Plaintiff's counsel is due to have knee surgery on October 18, 2019 and will be unable to work for at least a couple of days post surgery.

This stipulation to extend the deadline is made in good faith and not for purposes of delay.

September 30, 2019.

KEMP & KEMP

FISHER & PHILLIPS LLP

By: /s/ James P. Kemp, Esq.  
 7435 W. Azure Dr.  
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 Las Vegas, Nevada 89130  
 Attorneys for Plaintiff

By: /s/ Scott M. Mahoney, Esq.  
 300 South Fourth Street  
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 Las Vegas, Nevada 89101  
 Attorneys for Defendants

IT IS SO ORDERED:

  
 HON. JAMES C. MAHAN, DISTRICT JUDGE

Dated: October 1, 2019